Case 1:24-mj-30500-PTM ECF No 1 Page 10 11/20/24 Page 1 of 16 16/989) 895-5712

Special Agent: Laura Trainer Telephone: (313) 226-0500 AO 91 (Rev. 11/11) Criminal Complaint

### UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America Nathaniel Coady

Case No. 1:24-mj-30500

Judge: Morris, Patricia T. Filed: 11-20-2024

C	RIMINAL COMPLAINT			
I, the complainant in this case, state that	the following is true to the	best of my knowled	ge and belief.	
On or about the date(s) ofMay 22, 20	17 and February 13, 2018	in the county of	Midland	in the
Eastern District of Michigan	, the defendant(s) vio	lated:		
Code Section	Offense Description			
18 U.S.C § 2251(a)	Sexual Exploitation of a minor and attempts			
This criminal complaint is based on thes	e facts:			
See attached affidavit.				
Continued on the attached sheet.		9 97		
		Complainant's	signature	
	L	Laura Trainer, Special A	Agent H.S.I.	
Sworn to before me and signed in my presence		Triniea name	ana iiie	
and/or by reliable electronic means.		2/10/	11	
Date: November 20, 2024		Judge's sign	nature	
City and state: Bay City, Michigan	Hon. 1	Patricia T. Morris, U.S	S. Magistrate Judge	;
-		Printed name		

## AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR CRIMINAL COMPLAINT AND ARREST WARRANT

I, Laura Trainer, being first duly sworn, state as follows:

#### I. INTRODUCTION

- 1. I am a Special Agent with the Department of Homeland Security Homeland Security Investigations (HSI) in Detroit, Michigan. I have been employed as a Special Agent for HSI since March 2007 and am currently assigned to the Cyber Crimes Group. While employed as a Special Agent by HSI, I have assisted with investigations related to child exploitation and child pornography. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. In June 2019, I successfully completed the Internet Crimes Against Children (ICAC) Undercover Chatting Investigations training held in Fairfax, Virginia. In August 2020, I attended the Crimes Against Children Conference hosted virtually by the Dallas Children's Advocacy Center.
- 2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Nathaniel Ray Coady for violations of Title 18, United States Code, Sections 2251(a)(sexual exploitation of a minor and attempts).
- 3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by

other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Nathaniel Ray Coady.

4. Pursuant to the provisions of Title 18, United States Code, section 2256, "child pornography," as used in this affidavit, includes any visual depiction, including any photograph, film, video, picture, or computer-generated image or picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct.

### BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

5. The investigation, described more fully below, involves individuals who have engaged in the sexual exploitation of children through an internet-based, videoconferencing and chat application ("Application A") <sup>1</sup>. Based on the

<sup>&</sup>lt;sup>1</sup> The name and capabilities of Application A are known to law enforcement, and include the ability to exchange chat messages, images and live video communications through the internet. The name of Application A is known to law enforcement but anonymized in this affidavit to protect operational security as HSI's investigation of others who engage in the sexual exploitation of children remains ongoing.

investigation, there is probable cause to believe that an individual identified as Nathaniel Ray Coady, has, among other things, used a particular account on Application A to engage or attempt to engage in the sexual exploitation of minors in violation of the above federal criminal statutes.

#### **Background on Application A**

- 6. Based on my training, experience, and review of publicly available information, I know that Application A is a software product that allows users to conduct live video chats and voice calls with other users over the internet. Application A users can also send instant messages, exchange files and images, send video messages, and conduct multi-person conference calls. Application A is available for use on personal computers as well as smartphones, tablets, and other electronic devices. Users can sign up for an account and access Application A directly through Application A's website; alternatively, users can download the application, which allows them to access Application A from computers, tablets, cellular phones, certain televisions, and other electronic devices.
- 7. To access Application A, subscribers must create an account. Application A assigns a subscriber a unique name or ID, and a subscriber can then add a display name to their account. The user can change the display name at any time. The unique name or ID, by contrast, cannot be changed by the user.

8. Application A records some IP addresses associated with user activity, including the original IP address used for the creation of the account and the IP addresses captured at the time the user logs in to Application A. Application A may preserve chat communications and media content, including videos and images exchanged in chat conversations. Whether content is stored and retained, however, is a user-driven setting—that is, the user can determine whether the content will be retained. Application A does not store or retain the content of live video transmissions.

# Background on Online Child Sex Trafficking and Exploitation via Webcam and the Internet

- 9. HSI is investigating individuals who provide access to pre-produced child sexual abuse material and live-streaming online webcam shows involving the sexual abuse of children to paying customers worldwide. This growing transnational child-sexual-abuse industry includes child sex traffickers in, among other places, the Philippines, who collect viewership fees from vetted customers scattered throughout the world. Paying customers often request that these child sex traffickers provide pre-recorded depictions of minors engaging in sexually explicit conduct or sexually abuse minors in real time during private webcam interactions on a variety of streaming video services and applications, including Application A.
- 10. Based on my training, experience, and information conveyed to me by other law enforcement agents involved in the investigation of live-streaming

depictions of child sexual abuse, I know that it is common for such traffickers in the Philippines and elsewhere to be communicating with a large number of individuals who are paying for access to such material. I also know that it is common for the paying customers to be communicating with other traffickers—and sometimes many other traffickers—who are selling access to similar material over the internet. These individuals often use a variety of money service businesses to pay the traffickers or associates of the traffickers for access to this material, including Western Union, WorldRemit, MoneyGram, PayPal, Xoom, and Remitly.

11. HSI has identified an individual (hereinafter referred to as the "trafficker") operating a child-sex-trafficking network from the Philippines. Based on undercover activity and other investigation, HSI is aware that the trafficker did, in fact, have access to minors to sexually abuse on camera and has offered to provide access, through the trafficker's account on Application A, to visual depictions of one or more minors engaging in sexually explicit conduct in exchange for money.

### **INVESTIGATIVE DETAILS**

12. HSI Detroit received information that an individual, later identified as Nathaniel Coady, who was residing in the Eastern District of Michigan, which is within HSI Detroit's Area of Responsibility was chatting with three different

Application A of minor aged children that the traffickers had access to, and sending financial payments to two of the traffickers via Moneygram in exchange for the sex shows, between the period of on or about May 22, 2017 and February 13, 2018.

13. For instance, on June 12, 2017, the following excerpts occurred verbatim between Trafficker Account 1 and Coady:

COADY: Who is this?

TRAFFICKER 1: Im site

COADY: I can't tell if you just changed your name,

have we talked before?

TRAFFICKER 1: From247

Yes we talk site

COADY: Ohhhhh... did I tell you what I want?

TRAFFICKER 1: Underage

COADY: <ss type="smile">: )</ss> do yo uhave?

TRAFFICKER 1: Ihave cousin

How old ulike,,?

COADY: very young, how young do you have for

show?

TRAFFICKER 1: , ihave 10

COADY: <ss type="smile">: )</ss> what will she do

in show

for me? Anything uwant TRAFFICKER 1: What do ulike finger deep inside pussy, suck on toy, COADY: moaning maybe show with boy Oh sure I have Boy and Girl TRAFFICKER 1: will you prove you have girl and she will do COADY: show before I pay? TRAFFICKER 1: Ok sure TRAFFICKER 1 initiated a call with COADY at 9:20. COADY: ok, now I see mmmmmm what does she do with boy? TRAFFICKER 1: boy TRAFFICKER 1 ended the call with COADY at 9:21. TRAFFICKER 1: Suck Only COADY: does he like it?

She can finger fuck?

<ss type="smile">: )</ss> does boy cum in

show? does she

take finger deep in pussy

TRAFFICKER 1: Yes

Only to face

Cum

No pussy

COADY: and how much for show?

TRAFFICKER 1: 80\$?

COADY: how about 60? how do you like pay?

TRAFFICKER 1: Moneygram?

COADY: Moneygram is fine

TRAFFICKER 1: Can u do80?

COADY: for 80? two boy girl shows?

I need your full name

TRAFFICKER 1: RONALYN CAMACHO

COADY: phillipines, cash pickup?

after I send cash, ho long til show?

move camera down a little

TRAFFICKER 1: YES

**CASH PICKUP** 

COADY: pesos or usd?

TRAFFICKER 1: Call me now

COADY: can we start as soon as I send?

TRAFFICKER 1: Send me now

The COADY sends a message to TRAFFICKER 1 that contains a receipt confirmation containing the name "RONALYN CAMACHO", the country "Philippines", the amount "85.00 USD" and a Cash Pickup Authorization number "42834028".

TRAFFICKER 1: did u send?

COADY: yes, sent details

TRAFFICKER 1: ur name?

COADY: Nathaniel Coady

write it down so I can erase it

have her start show <ss type="smile">:

)</ss>?

Can yo uput finger in her pussy?

TRAFFICKER 1: yes

i will suck her pusyy?

COADY: no that's good, another show tomorrow

14. On June 7, 2017, the following excerpts occurred verbatim between

Trafficker Account 2 and the COADY:

COADY: It's waiting for you. Do you really need my

name to pic

it up?

TRAFFICKER 2: Yes

COADY: Nathaniel Coady

I did, but then erased it

TRAFFICKER 2: And no Number Nw <ss type="sad">:

(</ss>

COADY: 85011554

TRAFFICKER 2: Send transaction

At 8:15, the COADY sent Trafficker 2 a transaction receipt from Moneygram. The date on the transaction was "June 5, 2017 at 10:14 PM CDT". The Sender Information Name was "Nathaniel Coady" and the phone number listed was "+19896004214". The Receiver Information Name matched the name TRAFFICKER 2 sent to the COADY. The Expected Destination was listed as

"Philippines". A cash reference number was listed along with the date available in the expected destination, and a transfer amount of "55.00 USD".

COADY: This is what I have

Did you write it down? When can you do show?

TRAFFICKER 2: Tommrw morning?

COADY: ok, what time?

Got to go, put what time and I'll be back to

see later

TRAFFICKER 2: 6am hon

Uwill delete again?

COADY: YES

15. On June 20, 2017, the following excerpts occurred verbatim between Trafficker Account 2 and the COADY:

TRAFFICKER 2 initiated a call with COADY at 21:31.

COADY: I see <ss type="smile">: )</ss>

mmmm

like seeing her face too

can you put your finger inside her?

TRAFFICKER 2: me?

COADY: sure

TRAFFICKER 2: ok

COADY: so I can see it go in, finger fuck her

ok, turn her over

hello

do you have boy there?

no

TRAFFICKER 2:

	boy only	
COADY:	ok have her spread legs and play with pussy and say daddy mmmmm can she suck man's cock?	
TRAFFICKER 2:	yes, nextshow today	
COADY:	mmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmm	
TRAFFICKER 2:	OH but if I do u will stay help?	
COADY:	I wil help if she sucks man's cock	
TRAFFICKER 2:	she suck man	
COADY:	yes	
TRAFFICKER 2:	100\$	
COADY:	no	
TRAFFICKER 2:	howmuch	
COADY:	50	
TRAFFICKER 2:	ok can u d60?	
COADY:	IF she really suck, but not if she is scared and won't put in Mouth	
TRAFFICKER 2:	we have more	

do on here most of guy

and the cumming

face

COADY: want to see, will help if she really suck man

cock and he cum on face

60

TRAFFICKER 2: yes

COADY: do it

TRAFFICKER 2: u send first?

COADY: no

forget it

just finish show

have her suck on finger

TRAFFICKER 2: yes

guy cumming

COADY: show first, then pay tonight

TRAFFICKER 2: No

Pay me first

COADY: fisnish show

TRAFFICKER 2 ended the call with COADY at 21:45.

16. I have reviewed the chat communications on Application A between the Coady and Traffickers 1, 2 and 3. Based on my review, and my training, experience, and information conveyed to me by other law enforcement officers involved with the investigation of online child sex trafficking, I believe the chat

conversations are consistent with the sale of live-streaming depictions of child sexual abuse, wherein the child sex trafficker provides another individual with access to pre-produced or live-streaming video depictions of minors engaged in sexually explicit conduct in exchange for money.

- 17. As noted above, the Coady's conversations with Trafficker's 1, 2 and 3 occurred between May 22, 2017, and February 13, 2018, and included many exchanges similar to the ones described above.
- 18. On September 26, 2024, a subpoena was sent to Western Union Financial Services, Inc. requesting account information associated with Coady between September 26, 2017, and September 25, 2024. Western Union provided transactional data in response to the subpoena. The "Sender Name" for all the payments was listed as Nathaniel Coady, the "Sender Phone Number" is listed as (989)600-4214, the "Sender DOB [date of birth]" is listed as 1970.XX.XX and the "Sender Address" is listed as XXX Lambros, Midland, MI 48642. Three different payments made in September and October 2018 included a "Sender IP" of 75.134.170.237. Using an open-source website, I determined the "Sender IP 75.134.170.237" matched the information obtained from the IP Address used to create Coady's Account on Application A.
- 19. I confirmed that the phone number (989)600-4214 listed in one of the Moneygram payments was associated with Nathaniel Ray Coady in the Eastern

District of Michigan. Further, a search of a public records database confirmed that Nathaniel Coady was associated with the same residence located at XXX Lambros, Midland, MI 48642.

- 20. On November 20, 2024, personnel from HSI Detroit executed a federal search warrant at Coady's residence. Coady was at the residence during the search warrant and declined to speak to law enforcement.
- 21. A search of the residence was conducted, and a Samsung Galaxy S23 Ultra cell phone was located in the Coady's bedroom on the nightstand next to the bed. During a manual review of this phone, I observed that the phone was named "Nathaniel's S23 Ultra" and the phone number was listed as (989)600-4214.

#### III. CONCLUSION

22. I respectfully submit that there is probable cause to believe that Nathanial Ray Coady violated Title 18, United States Code, Sections 2251(a). Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for Nathaniel Ray Coady.

Respectfully submitted,

Laura L. Trainer, Special Agent
Department of Homeland Security
Homeland Security Investigations

Subscribed and sworn to before me on the 20th day of November 2024.

Hon. Patrica T. Morris

UNITED STATES MAGISTRATE JUDGE